

EXHIBIT A

LAW OFFICES OF JEFFREY S. HASSON
By: Jeffrey S. Hasson, Esq.
(Atty ID#026611993)
320 Cedar Lane
Teaneck, New Jersey 07666
(201) 928-0300
Attorney for Plaintiff

FILED
CUSTOMER SERVICE
FEB 29 2016
SUPERIOR COURT NEW JERSEY
HUDSON COUNTY
CIVIL DIVISION

JESSY TORREJON TREVEJO,

Plaintiffs,

v.

WALMART, WAL-MART STORES,
INC., WALMART SUPERCENTER,
JOHN DOE 1-10 and XYZ CORP. 1-10
(fictitious names for persons and/or
entities as yet unidentified),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY
DOCKET NO.: L-864-16

CIVIL ACTION

COMPLAINT & JURY DEMAND

Plaintiff, Jessy Torrejon Trevejo, residing at 1208 Kerrison Avenue, Union City, County of Hudson, State of New Jersey, by way of Complaint against the Defendants, WALMART, WAL-MART STORES, INC., WALMART SUPERCENTER, (hereinafter, "WALMART") John Doe 1-10, and XYZ Corp. 1-10 (fictitious names for persons and/or entities as yet unidentified), says that:

FIRST COUNT

1. On or about July 2, 2014, the Plaintiff, Jessy Torrejon Trevejo, was lawfully on the premises located at or about 400 Park Plaza Dr., Secaucus, County of Hudson, State of New Jersey, that is owned and maintained by the Defendants WALMART.

2. At the aforesaid time and place, the Defendants, WALMART, were negligent in that they:

- A. did not keep the premises in a safe condition;
- B. did not exercise proper care;
- C. caused a dangerous and hazardous condition to exist;
- D. allowed a nuisance to exist;
- E. failed to provide proper safeguards and/or warnings on the property;
- F. failed to provide proper, safe, and clear access for persons allowed lawfully on the property;
- G. and was otherwise negligent in the premises.

3. As a direct and proximate result of the aforesaid negligence of the Defendants, the Plaintiff slipped and fell, sustaining injuries, has been disabled, has incurred expenses for treatment of said injuries, suffered and will suffer in the future, great pain and torment, both mental and physical, will, in the future, be compelled to expend large and diverse sums of money for hospitalization, medical treatment and related medical care and was and will, in the future, be prevented from attending her duties for a long period of time.

WHEREFORE, Plaintiff, Jessy Torrejon Trevejo, demands judgment against Defendants, WALMART, John Doe 1-10 and XYZ Corp. 1-10 (fictitious names for persons and/or entities as yet unidentified), jointly, severally, or in the alternative, for damages together with attorneys' fees, interest, and cost of suit.

SECOND COUNT

1. Plaintiff repeats each and every allegation of the First Count herein and makes the same a part hereof.

2. The negligence attributed to Defendants, WALMART is, in fact, attributable to the Defendants John Doe 1-10 and XYZ Corp. 1-10 (fictitious names for persons and/or entities as yet unidentified) jointly, severally, or in the alternative, against whom damages must lie.

WHEREFORE, Plaintiff, Jessy Torrejon Trevejo, demands judgment against Defendants, WALMART, John Doe 1-10 and XYZ Corp. 1-10 (fictitious names for persons and/or entities as yet unidentified), jointly, severally, or in the alternative, for damages together with attorneys' fees, interest, and cost of suit.

JURY DEMAND

Plaintiff demands trial by jury as to all issues.

DATED: February 22, 2016



JEFFREY S. HASSON, ESQ.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

The undersigned attorney for Plaintiff hereby demands that proof of all insurance which may extend coverage to Defendant for the subject incident and the limits of said coverage be furnished to Plaintiff within five (5) days of the date hereof.

DATED: February 22, 2016



JEFFREY S. HASSON, ESQ.

DEMAND TO ANSWER FORM C INTERROGATORIES

Pursuant to Rule 4:17-1(b)(ii), the plaintiff hereby demands that, in lieu of service of interrogatories, each defendant represented by your office provide answers to the Uniform Interrogatories set forth in Form C and C (2) of Appendix II of the Court Rules. Pursuant to Rule 4:17-4(b), each defendant shall serve answers upon the plaintiff within 60 days from the date that this Demand was served.

DATED: February 22, 2016


JEFFREY S. HASSON, ESQ.

CERTIFICATION

Pursuant to R.4:5-1, the Plaintiff hereby certify that the within matter of controversy is not the subject of any action pending in any other jurisdiction, nor is it the subject of any arbitration matter pending in any other jurisdiction.

DATED: February 22, 2016


JEFFREY S. HASSON, ESQ.



DESIGNATION OF TRIAL COUNSEL

The undersigned attorney for Plaintiffs hereby designates Jeffrey S. Hasson, Esq., as trial counsel herein.

DATED: February 22, 2016


JEFFREY S. HASSON, ESQ.

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 Pleading will be rejected for filing, under <i>Rule</i> 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. AMOUNT: OVERPAYMENT: BATCH NUMBER:	
	ATTORNEY / PRO SE NAME JEFFREY HASSON, ESQ		TELEPHONE NUMBER (201) 928-0300	
	COUNTY OF VENUE Hudson		DOCKET NUMBER (when available) L-864-16	
	FIRM NAME (if applicable) LAW OFFICES OF JEFFREY S HASSON		DOCUMENT TYPE COMPLAINT	
OFFICE ADDRESS 320 CEDAR LANE, TEANECK, NJ 07666		JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
NAME OF PARTY (e.g., John Doe, Plaintiff) JESSY TORREJON TREVEJO, Plaintiff		CAPTION JESSY TORREJON TREVEJO V. WALMART ET AL.		
CASE TYPE NUMBER (See reverse side for listing) 605	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> Yes <input type="checkbox"/> No				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule</i> 1:38-7(b).				
ATTORNEY SIGNATURE:				

LAW OFFICES OF JEFFREY S. HASSON
By: JEFFREY S. HASSON, ESQ.
(Atty ID #026611993)
320 Cedar Lane
Teaneck, New Jersey 07666
(201) 928-0300
Attorney for Plaintiff

JESSY TORREJON TREVEJO,

Plaintiffs,

v.

WALMART, WAL-MART STORES,
INC., WALMART SUPERCENTER
JOHN DOE 1-10 and XYZ CORP. 1-10
(fictitious names for persons and/or
entities as yet unidentified),
Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY
DOCKET NO.: HUD-L-864-16

CIVIL ACTION

SUMMONS

The State of New Jersey, to the Above Named Defendant(s):

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appears above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 for Law Division and Chancery Division and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Date: March 4, 2016

MICHELLE M. SMITH, ESQ
Michelle M. Smith, Clerk of the Superior Court

Name of Defendant to be served:
Walmart Supercenter
400 Park Plaza Dr.
Secaucus, NJ 07094

LAW OFFICES OF JEFFREY S. HASSON

By: JEFFREY S. HASSON, ESQ.

(Atty ID #026611993)

320 Cedar Lane

Teaneck, New Jersey 07666

(201) 928-0300

Attorney for Plaintiff

JESSY TORREJON TREVEJO,

Plaintiffs,

v.

WALMART, WAL-MART STORES,
INC., WALMART SUPERCENTER
JOHN DOE 1-10 and XYZ CORP. 1-10
(fictitious names for persons and/or
entities as yet unidentified),
Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY
DOCKET NO.: HUD-L-864-16

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Date: March 4, 2016

MICHELLE M. SMITH, ESQ

Michelle M. Smith, Clerk of the Superior Court

Name of Defendant to be served:

Walmart

400 Park Plaza Dr.

Secaucus, NJ 07094

LAW OFFICES OF JEFFREY S. HASSON

By: JEFFREY S. HASSON, ESQ.

(Atty ID #026611993)

320 Cedar Lane

Teaneck, New Jersey 07666

(201) 928-0300

Attorney for Plaintiff

JESSY TORREJON TREVEJO,

Plaintiffs,

v.

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INC., WALMART SUPERCENTER
JOHN DOE 1-10 and XYZ CORP. 1-10
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SUMMONS

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Date: March 4, 2016

MICHELLE M. SMITH, ESQ

Michelle M. Smith, Clerk of the Superior Court

Name of Defendant to be served:

Wal-Mart Stores, Inc.

400 Park Plaza Dr.

Secaucus, NJ 07094

JESSY TORREJON TREVEJO

Plaintiff

20160304154240

Superior Court Of New Jersey

vs

HUDSON Venue

WALMART, ET AL

Defendant

Docket Number: HUD L 864 16

Person to be served (Name and Address):WALMART SUPERCENTER
400 PARK PLAZA DR.
SECAUCUS NJ 07094

By serving: WALMART SUPERCENTER

Attorney: JEFFREY S. HASSON, ESQ

Papers Served: SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT
NOTICE, DEMANDSService Data: ☒ Served Successfully ☐ Not Served

Date/Time: 3/7/2016 6:46 PM

☐ Delivered a copy to him/her personally☐ Left a copy with a competent household member over 14 years of age
residing therein (indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent,
registered agent, etc. (indicate name & official title at right)**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ 109.98

Name of Person Served and relationship/title:

FALIPA SANTOS

MANAGING AGENT

Description of Person Accepting Service:

SEX: M AGE: 21-35 HEIGHT: 5'4"-5'8" WEIGHT: 131-160 LBS. SKIN: WHITE HAIR: BROWN OTHER: _____

Unserved:

- ☐ Defendant is unknown at the address furnished by the attorney
☐ All reasonable inquiries suggest defendant moved to an undetermined address
☐ No such street in municipality
☐ Defendant is evading service
☐ Appears vacant
☐ No response on:

Date/Time: _____
 Date/Time: _____
 Date/Time: _____

Other:

RECEIVED
 CUSTOMER SERVICE TEAM
 MAR 10 2016
 SUPERIOR COURT OF NEW JERSEY
 COUNTY OF HUDSON
 CIVIL DIVISION #2

Served Data:

Subscribed and Sworn to me this

8 day of March, 2016

Notary Signature: Marelyn Meneses

MARELYN MENESES

NOTARY PUBLIC OF NEW JERSEY

My Commission Expires Dec. 6, 2016

Commission Expiration 12/6/2016I, MARK SACRIPANTI,was at the time of service a competent adult, over the age
of 18 and not having direct interest in the litigation. I declare
under penalty of perjury that the foregoing is true and
correct.

Signature of Process Server

3/8/2016
DateName of Private Server: MARK SACRIPANTI Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952

JESSY TORREJON TREVEJO

Plaintiff

20160304154240

vs

Superior Court Of New Jersey

WALMART, ET AL

Defendant

HUDSON Venue

Docket Number: HUD L 864 16

Person to be served (Name and Address):

WALMART SUPERCENTER

400 PARK PLAZA DR.

SECAUCUS NJ 07094

By serving: WALMART SUPERCENTER

Attorney: JEFFREY S. HASSON, ESQ

Papers Served: SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT
NOTICE, DEMANDSService Data: ☒ Served Successfully ☐ Not Served

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residing therein (Indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent,
registered agent, etc. (Indicate name & official title at right)**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ 129.98

Name of Person Served and relationship/title:

FALIPA SANTOS

MANAGING AGENT

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SEX: M AGE: 21-35 HEIGHT: 5'4"-5'8" WEIGHT: 131-160 LBS. SKIN: WHITE HAIR: BROWN OTHER: _____

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☐ Appears vacant
☐ No response on:

Date/Time: _____
 Date/Time: _____
 Date/Time: _____

Other:

Served Data:

Subscribed and Sworn to me this

8 day of March, 2016

Notary Signature: MARELYN MENESES

MARELYN MENESES

NOTARY PUBLIC OF NEW JERSEY

My Commission Expires Dec. 6, 2016

Commission Expiration 12/6/2016

JB

FILED
STAMPED COPY WILL
ARRIVE SHORTLY

I, MARK SACRIPANTI,

was at the time of service a competent adult, over the age
 of 18 and not having direct interest in the litigation. I declare
 under penalty of perjury that the foregoing is true and
 correct.

Signature of Process Server

3/8/2016
Date

Name of Private Server: MARK SACRIPANTI Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952

JESSY TORREJON TREVEJO

Plaintiff

20160304154800

Superior Court Of New Jersey

VS

HUDSON Venue

WALMART, ET AL

Defendant

Docket Number: HUD L 864 16

Person to be served (Name and Address):

WALMART
400 PARK PLAZA DR.
SECAUCUS NJ 07094
By serving: WALMART

Attorney: JEFFREY S. HASSON, ESQ

Papers Served: SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT
NOTICE, DEMANDS

Service Data: ☒ Served Successfully ☐ Not Served

Date/Time: 3/7/2016 6:47 PM

☐ Delivered a copy to him/her personally

☐ Left a copy with a competent household member over 14 years of age
residing therein (indicate name & relationship at right)

☒ Left a copy with a person authorized to accept service, e.g. managing agent,
registered agent, etc. (indicate name & official title at right)

AFFIDAVIT OF SERVICE

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ 24.99

Name of Person Served and relationship/title:

FALIPA SANTOSMANAGING AGENT**Description of Person Accepting Service:**SEX: M AGE: 21-35 HEIGHT: 5'4"-5'8" WEIGHT: 131-160 LBS. SKIN: WHITE HAIR: BROWN OTHER: _____**Unserved:**

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☐ No response on:

Date/Time: _____
 Date/Time: _____
 Date/Time: _____

Other: _____

Served Data:

Subscribed and Sworn to me this

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MARELYN MENESES

NOTARY PUBLIC NEW JERSEY
 My Commission Expires Dec. 6, 2016

Commission Expiration 12/6/2016I, MARK SACRIPANTI,

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 of 18 and not having direct interest in the litigation. I declare
 under penalty of perjury that the foregoing is true and
 correct.

Signature of Process Server

3/8/2016
DateName of Private Server: MARK SACRIPANTI Address: 2009 Morris Avenue UNION, NJ 07093 Phone: (800) 672-1952

RECEIVED
 CUSTOMER SERVICE TEAM
 MAR 10 2016
 SUPERIOR COURT OF NEW JERSEY
 COUNTY OF HUDSON
 CIVIL DIVISION #2

JESSY TORREJON TREVEJO

Plaintiff

20160304154800

vs

Superior Court Of New Jersey

WALMART, ET AL

Defendant

HUDSON Venue

Docket Number: HUD L 864 16

Person to be served (Name and Address):

WALMART
400 PARK PLAZA DR.
SECAUCUS NJ 07094
By serving: WALMART

AFFIDAVIT OF SERVICE

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ 24.99

Attorney: JEFFREY S. HASSON, ESQ

Papers Served: SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT
NOTICE, DEMANDS

Service Data: ☒ Served Successfully ☐ Not ServedDate/Time: 3/7/2016 6:47 PM☐ Delivered a copy to him/her personally☐ Left a copy with a competent household member over 14 years of age residing therein (indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc. (indicate name & official title at right)

Name of Person Served and relationship/title:

FALIPA SANTOSMANAGING AGENT**Description of Person Accepting Service:**SEX: M AGE: 21-35 HEIGHT: 5'4"-5'8" WEIGHT: 131-160 LBS. SKIN: WHITE HAIR: BROWN OTHER: _____**Unserved:**

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☐ Appears vacant
☐ No response on: _____

Date/Time: _____
 Date/Time: _____
 Date/Time: _____

Other: _____

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Served Data:

Subscribed and Sworn to me this

8 day of March, 2016Notary Signature: Marelyn Meneses

MARELYN MENESES

NOTARY PUBLIC FOR NEW JERSEY

My Commission Expires Dec. 6, 2016

Commission Expiration 12/6/2016

JB

I, MARK SACRIPANTI,

was at the time of service a competent adult, over the age of 18 and not having direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

3/8/2016
DateName of Private Server: MARK SACRIPANTI Address: 2009 Morris Avenue UNION, NJ 07093 Phone: (800) 672-1952

HUDSON COUNTY SUPERIOR COURT
HUDSON COUNTY
583 NEWARK AVENUE
JERSEY CITY NJ 07306

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 217-5162
COURT HOURS 8:30 AM - 4:30 PM

DATE: FEBRUARY 29, 2016
RE: TREVEJO VS WALMART ET ALS
DOCKET: HUD L -000864 16

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON DANIEL DALESSANDRO

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (201) 795-6908.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING. PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE

CE
WITH R. 4:5A-2.

ATTENTION:

ATT: JEFFREY S. HASSON
JEFFREY S. HASSON
320 CEDAR LANE
TEANECK NJ 07666

JUURIVO